



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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May 9, 2025

**BY ECF**

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: American Honda Finance Corporation and HVT, Inc. v. City of New York  
Case No. 24-cv-1137 (JLR)

Dear Judge Rochon:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York and represent Defendant, the City of New York in the above-referenced matter. I write pursuant to Section 1.F. of the Court's Individual Rules of Practice in Civil Cases to respectfully request a 30-day extension of the fact discovery deadline in this action, until June 13, 2024. Fact discovery is set to close on May 14, 2025. This is the fourth request for an extension of time to complete fact discovery. The previous requests for extensions of time to complete fact discovery were granted. I have requested consent for additional time to complete fact discovery from Plaintiffs' counsel but, as of the filing of this letter, have not yet received a response. This adjournment, if granted, will have no impact on other deadlines in this case.

The reason for the requested extension is that the parties are attempting to resolve discovery disputes regarding the City's Second Request for the Production of Documents and Second Set of Interrogatories and held a meet and confer regarding such disputes today.<sup>1</sup> We require additional time to see if we will be able to resolve these disputes prior to seeking Court intervention and do not believe that these disputes can be resolved, and all discovery produced, by May 14.

Thank you for your consideration of this request.

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<sup>1</sup> Defendant served these requests on March 14, 2025 and have yet to receive any written responses from Plaintiffs.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'G. Zilkha', is written over a horizontal line.

Genan F. Zilkha

Assistant Corporation Counsel

cc: All Counsel by ECF